

Telco Triad

Community Credit Union

PRIVACY POLICY

GOVERNING LAW/REGULATION:

Gramm-Leach-Bliley Act of 1999, 15 U.S.C. 6801 et seq.
National Credit Union Administration (NCUA) Privacy of Consumer Financial Information; 12 CFR 716.1
Consumer Financial Protection Bureau (CFPB) Privacy of Consumer Financial Information, Regulation P, 12 CFR 1016
For state-chartered, privately insured Credit Unions: Federal Trade Commission (FTC) Privacy Rule, 16 CFR 313

PURPOSE

Laws governing the treatment of consumer's nonpublic personal information serve to protect consumers from unlimited disclosure of personal financial information. Financial institutions may disclose, under certain conditions, nonpublic personal information about consumer members to affiliates and nonaffiliated third parties, provided appropriate notice has been provided to each consumer who obtains a Credit Union product or service and the consumer has not opted out of such disclosure.

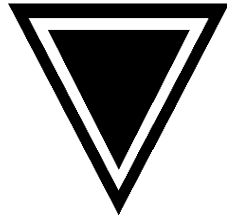
POLICY STATEMENT

This Credit Union recognizes its responsibility to protect the privacy of our members' nonpublic personal information. We are committed to providing financial products and services that enable our members to meet their financial needs and goals while at the same time protecting the members' nonpublic personal information.

It is the intent of this Credit Union to comply with all applicable laws and regulations governing the privacy of nonpublic personal information.

BOARD RESPONSIBILITY

The Board of Directors is ultimately responsible for this Credit Union's adherence to all applicable laws and regulations governing collection, use or disclosure of nonpublic personal information obtained from consumer members in the ordinary course of business. For effective administration of this Policy, the Board designates Tim Piepho, CEO, to direct the activities required to implement and maintain compliance with this Policy. The Board will review this Policy whenever a change in law or regulation requires a Policy review, the Credit Union changes its information collection, use or sharing practices, or when a matter of noncompliance is brought to the Board's attention by an employee, a member, legal counsel, or a person having audit or regulatory oversight, but no less frequently than annually.



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PRIVACY POLICY (continued)

The Board's designee to direct activities related to this Policy is authorized to engage key Credit Union employees to develop, implement and maintain appropriate detailed privacy procedures, incorporating the following elements.

DEFINITIONS

For the purpose of this Privacy Policy the following definitions shall apply:

Affiliate means any company that controls, is controlled by, or is under common control with another company. They can be financial or nonfinancial companies.

Non-affiliate means any company not related by common ownership or control. They can be financial and non-financial companies.

Consumer means an individual who obtains or has obtained a financial product or service from the Credit Union that is to be used primarily for personal, family, or household purposes, or that individual's legal representative.

Joint Marketing means a formal agreement between non-affiliated financial companies that together market financial products or services to consumers.

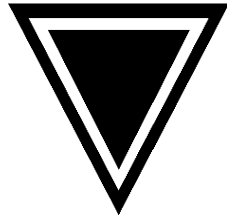
Nonpublic personal information means personally identifiable financial information; and any list, description, or other grouping of consumers (and publicly available information pertaining to them) that is derived using any personally identifiable financial information that is not publicly available.

Personally identifiable financial information means any information a consumer provides to the Credit Union to obtain a financial product or service or as a result from any transaction.

GUIDELINES

To ensure members can rely on the quality of products and services we make available and be assured of the strictest confidentiality of the nonpublic personal information we obtain, our Credit Union stands behind the following privacy guidelines:

- The Credit Union will only collect personal information necessary to conduct our business. That means only what is necessary to provide competitive financial products and services and no more. We collect this information about members from applications and other forms, information about member transactions with us, our affiliates or others, and information we receive from consumer reporting agencies.



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PRIVACY POLICY (continued)

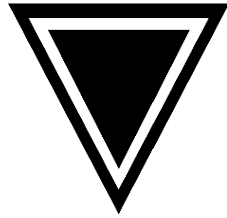
- The Credit Union discloses nonpublic personal information about its members and former members to companies that offer financial products and services, including insurance products and securities brokerage companies. The Credit Union also discloses nonpublic information to other nonaffiliated third parties as permitted by law.
- The Credit Union will partner only with businesses that follow strict confidentiality requirements. The businesses we select will offer products designed to enhance our members' economic well-being. Under no circumstances will we authorize those firms to charge a member's account without receiving their express consent, and we will not sell member information to telemarketing firms.
- Members that prefer that we not disclose nonpublic personal information about them to non-affiliated third parties may opt out of these disclosures, and direct us not to make those disclosures to nonaffiliated third parties. To opt out, members may call us at (712) 252-4368. Members may also notify us in writing by mailing a request to 1420 Tri View Avenue, Sioux City, IA 51103, or visit us online at www.telcotriad.org.
- The right to opt out does not apply if the Credit Union's disclosure of nonpublic personal information is necessary to effect, administer or endorse a transaction that a consumer requests or authorizes.

CONFIDENTIALITY AND SECURITY SAFEGUARDS

This Credit Union will protect the personal information of its members. We will maintain strong security controls to ensure that member information in our files and computers is protected. We limit employee access to confidential member financial information to those employees with a business reason for knowing such information. Additionally, we maintain physical, electronic, and procedural safeguards that comply with federal regulations.

DISCLOSURES

This Credit Union will disclose its privacy policies as required by law, using the model privacy form in the Appendix to Regulation P. An initial privacy notice will be provided to consumer members at the time a member relationship is established. If there is a change in the model privacy form or the Credit Union changes its privacy practices, a revised privacy notice will be provided to members in a conspicuous form they may keep.



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PRIVACY POLICY (continued)

The Credit Union will provide a privacy form annually, using the alternative delivery method. The alternative delivery method allows the annual privacy notice to be provided by posting a conspicuous notice on the Credit Union's website (www.telcotriad.org). The following conditions for use of the alternative delivery method will be satisfied:

- No opt-out rights are triggered by the Credit Union's information sharing practices under the Gramm-Leach-Bliley Act or the Fair Credit Reporting Act (FCRA), Section 615;
- The opt-out rights required by FCRA have previously been provided, or the annual privacy notice is not the only notice provided to satisfy the requirements;
- The information in the privacy notice has not changed since the member received the previous notice; and
- Model form provided in Regulation P (Appendix to Part 1016) is utilized for the annual privacy notice.

Members will be informed annually about the availability of the privacy notice on regular communication, such as a monthly statement. The notice will inform members of their right to request a written disclosure by calling (712) 252-4368 and that the privacy notice has not changed. If requested, the Credit Union will mail a privacy notice to the member within 10 days. If the conditions for the alternative delivery method are not satisfied, the Credit Union will annually mail its privacy notice to consumer members.

TRAINING

The Board's designee who directs compliance activities related to this Policy is authorized to coordinate annual training for all employees. Training will emphasize the confidentiality and integrity of nonpublic personal information, and duties of employees to protect such information. Employees whose responsibilities include account opening, consumer loans, or other consumer products and services will receive specialized training on describing the Credit Union's privacy practices to members and the proper delivery of initial privacy notices.

RECORD RETENTION

Records evidencing compliance with this Policy will be retained for one examination and audit cycle.

Board Review Date(s): 03/2009, 03/2012, 03/2014, 04/2015, 03/2016, 10/2016, 03/2017, Revised 01/2018